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United States Attorney  
STUART A. MINKOWITZ  
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970 Broad Street, Suite 700  
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(973) 645-2700  
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RECEIVED  
DEC 19 2006  
AT 8:30 5:21 P.M.  
WILLIAM T. WALSH  
CLERK

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

STATE OF NEW JERSEY, : Hon.  
 :  
 Plaintiff, : No.  
 :  
 v. : NOTICE OF REMOVAL  
 :  
 CHARLES TAMBURELLO, :  
 :  
 Defendant. :

TO: Ms. Elaine Vitellaro, C.M.C.A.  
Hanover Township Municipal Court Administrator  
Municipal Building  
1000 Route 10  
P.O. Box 250  
Whippany, New Jersey 07981-0250

Peter J. King, Esq.  
Hanover Township Municipal Prosecutor  
75-B North Beverwyck Road  
Lake Hiawatha, New Jersey 07034

PLEASE TAKE NOTICE that this case, previously pending in the  
Hanover Township Municipal Court under Summons Number S-2006-  
000383-1412, is hereby removed to the United States District  
Court for the District of New Jersey, pursuant to the provisions  
of 39 U.S.C. § 409(a) and 28 U.S.C. § 1442.

The defendant, Charles Tamburello, by and through his

attorney, Christopher J. Christie, United States Attorney, District of New Jersey (Stuart A. Minkowitz and Allan B.K. Urgent, Assistant U.S. Attorneys, appearing), respectfully states the following upon information and belief:

1. The complainant, an employee of the United States Postal Service, filed this action against her supervisor who was acting within the scope of his duties as a Manager of Distribution Operations at the time and place (United States Postal Service Facility, Whippany, New Jersey) alleged in the complaint.

2. The Complaint was served on the defendant, on or about October 30, 2006, a copy of which is attached hereto as Exhibit A.

3. In an Order dated March 29, 1999, and received by the defendant on November 14, 2006, the Hanover Township Municipal Court ordered reciprocal discovery under New Jersey Rules of Court (R. 7:7-7(c)). A copy is attached hereto as Exhibit B.

4. The State of New Jersey by its counsel, Thomas H. Westfield, Esq., Assistant Hanover Township Municipal Prosecutor, and the complainant, Ms. Margaret Grant, have represented that they have no objection to the removal of the action to this Court.

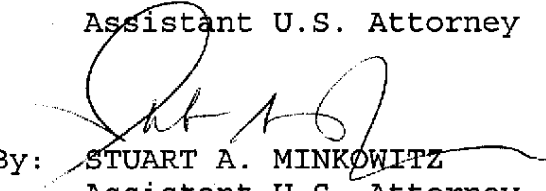
THEREFORE, in accordance with 39 U.S.C. § 409(a) and 28 U.S.C. § 1442, the above captioned action brought in the

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Hanover Township Municipal Court under Summons Number S-2006-000383-1412, is now removed to this Court.

Respectfully submitted,

CHRISTOPHER J. CHRISTIE  
United States Attorney  
ALLAN B.K. URGENT  
Assistant U.S. Attorney

  
By: STUART A. MINKOWITZ  
Assistant U.S. Attorney

Dated: December 19, 2006



COURT (NAME, ADDRESS, TELEPHONE NO.)

HANOVER TWP  
PO BOX 250  
WHIPPANY NJ 07981COUNTY OF MORRIS COURT CODE  
1412

COURT DOCKET NUMBER(S)

1 TURB 1

Defendant Name

CHARLES TAMBURELLO

Address

C/O JOE P. MOLONEY PLANT

City, State

WHIPPANY NJ 07981

Date of birth

00-00-0000

Date of arrest

00-00-0000

Number of co-defendants

Dr. Lic.#

SBI No.

Complainant

Name:

MARGARET P. GRANT

COMPLAINT -

SUMMONS

(IDENTIFY DEPARTMENT OR AGENCY REPRESENTED)

Residing at

11411 ROUTE 22 WEST  
NORTH PLAINFIELD NJ 07060Upon oath says that, to the best of (his) (her) knowledge,  
information and belief, the named defendant on or about the

MUNICIPAL CODE NO.

did, on 25 day of 10 2006

in

HANOVER TWP

1412

County of

N.J.

WITHIN THE JURISDICTION OF THIS COURT, DID COMMIT THE DISORDERLY PERSONS  
OFFENSE OF HARASSMENT SPECIFICALLY BY STATING TO HER "WHEN I COME AFTER YOU.  
TRUST ME. YOU WILL LOOSE. THAT'S A PROMISE" IN VIOLATION OF

In Violation Of:

Domestic Violence - Confidential

Charge Number	Charge Number	Charge Number
N.J.S. 17-25	ACSX	N.J.S. 17-25
Charge Number: 17-25 As Amended	ACSX	Charge Number As Amended
N.J.S. 1	ACSX	N.J.S. 1

Subscribed and sworn to before me this

25th

day of

October 20 2006

Signed

(NAME AND TITLE OF PERSON ADMINISTERING OATH)

Signed

(COMPLAINANT)

YOU ARE HEREDY SUMMONED TO APPEAR BEFORE THIS COURT TO ANSWER THIS COMPLAINT. IF  
YOU FAIL TO APPEAR ON THE DATE AND AT THE TIME STATED, A WARRANT WILL BE ISSUED  
FOR YOUR ARREST.  
DATE SUMMONS ISSUED 10/25/2006 DATE TO APPEAR 11/06/2006 TIME 05:00 PM

## POLICE RETURNED

X	I HEREBY CERTIFY THAT I SERVED THE WITHIN SUMMONS BY MAILING IT TO THE DEFENDANT AT 54 SOUTH JEFFERSON RD. WHIPPANY, NJ 07981 (THIS BEING HIS, (HER) LAST KNOWN ADDRESS)
1	I HEREBY CERTIFY THAT I SERVED THE WITHIN SUMMONS BY DELIVERING A COPY TO (NAME AND TITLE OF CORPORATE OFFICER OR OTHER AUTHORIZED AGENT)
1	I HEREBY CERTIFY THAT I SERVED THE WITHIN SUMMONS BY LEAVING A COPY AT THE DEFENDANT'S USUAL PLACE OF ABODE WITH (A MEMBER OF HIS (HER) FAMILY OVER 14 YEARS OF AGE)
1	I HEREBY CERTIFY THAT I SERVED THE WITHIN SUMMONS BY DELIVERING A COPY TO THE DEFENDANT PERSONALLY.
1	I HEREBY CERTIFY THAT I SERVED THE WITHIN SUMMONS BY LEAVING A COPY AT THE REGISTERED OFFICE OF THE DEFENDANT CORPORATION WITH (THE PERSON IN CHARGE THEREOF)
1	THIS IS TO CERTIFY THAT THE DEFENDANT COULD NOT BE FOUND NOR HAS HE ANY ABODE IN THIS COUNTY

DATE OF ACTION

Signed

Det. C. Thompson

H.T.P.D.

(NAME, TITLE AND DEPARTMENT OF OFFICER)



TOWNSHIP OF HANOVER MUNICIPAL COURT

ORDER REGARDING  
RECIPROCAL DISCOVERY  
PURSUANT TO RULE 7:7-7(C)

IN THE MATTER OF RECIPROCAL  
DISCOVERY BY THE STATE FROM  
DEFENDANTS

This matter having been opened to the Court upon application of Thomas Westfield, Prosecutor for the Township of Hanover, and for good cause having been shown;

It is on this 29th day of March, 1999;

ORDERED, pursuant to Rule 7:7-7(C), that when discovery is requested of the State by or on behalf of a defendant in any matter pending before the Court, the defendant shall permit the State to inspect, copy and photograph or be provided with copies of any relevant: (1) results or reports of physical or mental examinations and of scientific tests or experiments made in connection with the matter or copies of these results or reports within the possession, custody or control of the defendant or defense counsel; (2) any relevant books, originals or copies of papers and other documents or tangible objects, buildings or places within the possession, custody or control of the defendant or defense counsel; (3) the names and addresses of those persons known to defendant who may be called as witnesses at trial and their written statements, if any, including memoranda reporting or summarizing their oral statements; (4) written statements, if any, including any memoranda reporting or summarizing the oral statements, made by any witnesses whom the government may call as a witness at trial; and (5) the names and addresses of each person whom the defense expects to call to trial as an expert witness, the expert's qualifications, the subject matter on which the expert is expected to testify, and a copy of the

report, if any, of such expert witness, or if no report is prepared, a statement of the facts and opinions to which the expert is expected to testify and a summary of the grounds for each opinion. If this information is requested and not furnished, the expert may, upon application by the prosecuting attorney, be barred from testifying at trial.

A handwritten signature in dark ink, appearing to read "B. R. O'Toole", is written above a horizontal line.

Brian R. O'Toole, J.M.C.



Certificate of Service

This is to certify that I mailed a copy of the within Notice of Removal, by first class mail, on the date given below, to:

Ms. Elaine Vitellaro, C.M.C.A.  
Hanover Township Municipal Court Administrator  
Municipal Building  
1000 Route 10  
P.O. Box 250  
Whippany, New Jersey 07981-0250

Peter J. King, Esq.  
Hanover Township Municipal Prosecutor  
75-B North Beverwyck Road  
Lake Hiawatha, New Jersey 07034

I certify under penalty of perjury that the foregoing statements are true. Executed on this 19<sup>th</sup> day of December, 2006.

A handwritten signature in cursive script, appearing to read 'Mellic J. Stenall', is written over a horizontal line.